

1 Hon. Ricardo S. Martinez  
2  
3  
4  
5  
6

7 UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON

9 Joseph Stanley Pigott a.k.a. King Abdul Mumin) ) Case No. 2:19-cv-01489 RSM  
10 El, )  
11 Plaintiff, )  
12 )  
13 )  
14 )  
15 )  
16 )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )

Plaintiff, )  
v. )  
Heather Winslow Barr, David P. Tracy)  
(individual Jointly & Severally) Law Offices of)  
David P. Tracy & Zottman, Sarah Hudson)  
(individual Jointly & Severally) d.b.a. King)  
County Superior Court Bailiff, Attorney Kristin)  
Richardson (individual Jointly & Severally) d.b.a)  
King Couounty Superior Court Judge, Attorney)  
Kathryn D. Fields (individual Jointly & Severally))  
d.b.a. King County Superior Court Judge, King)  
County Superior Court, Sate of Washington, et al.,)  
Defendants.)

TO: Clerk Of The Court  
AND TO: All Parties

COMES NOW, Heather Barr, David Tracy and Law Offices of David P. Tracy and  
Zottman, herein and do answer and deny against Plaintiff's Complaint, as follows:

1. Defendants plead that this matter should dismissed pursuant to Federal CR 12 (B)(5)  
and (6). More specifically, for insufficient service of process and failure to state a claim upon which  
relief can be granted.

1           2. Defendants plead general denial of all claims by Plaintiff in response to sections I  
2 through VII and paragraphs 1 – 23.

3. Defendants plead res judicata and collateral estoppel.

5 WHEREFORE, having fully answered denied and affirmatively alleged against plaintiff's  
6 complaint, defendant pray for the following relief:

1. That plaintiff's complaint be dismissed with prejudice.
2. That defendant recovers their reasonable costs and reasonable attorney's fees.
3. For all such other relief which the Court shall deem just and equitable

DATED: October 22, 2019

DC Law Group NW

Matthew Cunanan  
Matthew Cunanan, WSBA # 42530  
[matthew@dclglawyers.com](mailto:matthew@dclglawyers.com)  
Of Attorneys for Defendants